

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
JESSICA DAVIDSON, ESQ.**

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC's Motion for Leave to File Their First Amended Answer and Affirmative Defenses.

2. Attached hereto as Exhibit 1 is a true and accurate copy of the relevant excerpts from the transcript of the May 27, 2021 deposition of Jun Du in MDL 2875.

3. Attached hereto as Exhibit 2 is a true and accurate copy of the proposed First Amended Answer and Affirmative Defenses of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC and Jury Demand.

4. Attached hereto as Exhibit 3 is a true and accurate copy of a version of the proposed First Amended Answer and Affirmative Defenses of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC and Jury Demand showing in redline the proposed revisions from the Answer and Jury Demand filed by these defendants at ECF [2549](#).

Respectfully submitted,

By: /s/ Jessica Davidson

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Dated: February 7, 2024